

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

IN AND FOR SUSSEX COUNTY

STATE OF DELAWARE

:

CRA#S

:

v.

:

:

EARL B. BRADLEY

:

INDICTMENT

ID# 0912008771 / 1004012120

:

BY THE GRAND JURY

The Grand Jury charges that EARL B. BRADLEY did commit the following offenses, to wit:

COUNT 1 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 15th day of February, 1999 and the 31st day of December, 1999, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE #1, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #1's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 2- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 12th day of August, 2004 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 2, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #2's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 3 - UNLAWFUL SEXUAL CONTACT SECOND DEGREE – S10-

EARL B. BRADLEY, between the 8th day of April, 2004 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally have sexual contact with CAROL DOE # 3, who had not reached her sixteenth birthday; to wit, Earl B. Bradley did intentionally touch CAROL DOE #3's vagina, in violation of Title 11, Section 768 of the Delaware Code.

COUNT 4- UNLAWFUL SEXUAL CONTACT SECOND DEGREE – S10-

EARL B. BRADLEY, between the 8th day of April, 2004 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally have sexual contact with CAROL DOE # 3, who had not reached her sixteenth birthday; to wit, Earl B. Bradley did intentionally touch CAROL DOE #3's buttocks, in violation of Title 11, Section 768 of the Delaware Code.

COUNT 5 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 23rd day of March, 2005 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 4, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #4's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 6- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 23rd day of March, 2005 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 4, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #4's anus, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 7- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 12th day of June, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 5, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #5's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 8- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 12th day of June, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 5, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #5's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 9- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 12th day of June, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 5, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #5's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 10- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 12th day of June, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 5, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #5's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 11 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 12th day of June, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 5, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #5's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 12 - RAPE IN THE SECOND DEGREE - S10-

EARL B. BRADLEY, between the 12th day of June, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 5, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #5's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 13 - CONTINUOUS SEXUAL ABUSE OF A CHILD - S10-

EARL B. BRADLEY, between the 12th day of June, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, while having recurring access to CAROL DOE #5, a child under the age of fourteen, did intentionally engage in three or more acts of sexual conduct with CAROL DOE # 5, over a period of time not less than three months in duration, in violation of Title 11, Section 778(a) of the Delaware Code.

COUNT 14- RAPE IN THE SECOND DEGREE - S10-

EARL B. BRADLEY, between the 29th day of March, 2007 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 6, who had not yet reached her fourteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #6's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 15- UNLAWFUL SEXUAL CONTACT FIRST DEGREE – S10-

EARL B. BRADLEY, between the 29th day of March, 2007 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally have sexual contact with CAROL DOE # 6, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did intentionally touch CAROL DOE #6's vagina, in violation of Title 11, Section 769(a)(2) of the Delaware Code.

COUNT 16 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 15th day of March, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 7, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #7's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 17- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 15th day of March, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 7, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #7's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 18- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 8th day of May, 2007 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 8, who had not yet reached her fourteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #8's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 19- SEXUAL EXPLOITATION OF A CHILD – S10-

EARL B. BRADLEY, between the 11th day of January, 2007 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did knowingly photograph or film a child, CAROL DOE #9, engaging in a prohibited sexual act or in the simulation of such an act; to wit, Earl B. Bradley did photograph or film CAROL DOE #9 as he exposed the child's vagina and buttocks to the camera, in violation of Title 11, Section 1108(1) of the Delaware Code.

COUNT 20- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 18th day of January, 2001 and the 23rd day of June, 2006, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 10, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #10's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 21- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 18th day of January, 2001 and the 23rd day of June, 2006, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 10, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #10's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 22- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 18th day of January, 2001 and the 23rd day of June, 2006, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 10, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #10's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 23- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 18th day of January, 2001 and the 23rd day of June, 2006, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 10, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #10's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 24- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 11th day of September, 2003 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 11, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #11's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 25- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 11th day of September, 2003 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 11, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #11's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 26- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 4th day of October, 2000 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 12, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #12's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 27 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 4th day of October, 2000 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 12, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #12's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 28- UNLAWFUL SEXUAL CONTACT SECOND DEGREE – S10-

EARL B. BRADLEY, between the 4th day of October, 2000 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally have sexual contact with CAROL DOE # 12, who had not reached her sixteenth birthday; to wit, Earl B. Bradley did intentionally touch CAROL DOE #12's breasts, in violation of Title 11, Section 768 of the Delaware Code.

COUNT 29- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 14th day of July, 2002 and the 20th day of March, 2007, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 13, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did insert an object inside the vagina of CAROL DOE #13, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 30- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 14th day of July, 2002 and the 20th day of March, 2007, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 13, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did insert an object inside the anus of CAROL DOE #13, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 31 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 32- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 33- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 34- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 35- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 36- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 37- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 38- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 39- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 40 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 41 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 14, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #14's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 42- CONTINUOUS SEXUAL ABUSE OF A CHILD – S10-

EARL B. BRADLEY, between the 9th day of January, 2001 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, while having recurring access to CAROL DOE #14, a child under the age of fourteen, did intentionally engage in three or more acts of sexual conduct with CAROL DOE # 14, over a period of time not less than three months in duration, in violation of Title 11, Section 778(a) of the Delaware Code.

COUNT 43- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 18th day of November, 2004 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 15, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #15's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 44- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 18th day of November, 2004 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 16, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #16's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 45 - UNLAWFUL SEXUAL CONTACT FIRST DEGREE – S10-

EARL B. BRADLEY, between the 2nd day of March, 2007 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally have sexual contact with CAROL DOE # 17, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did intentionally touch CAROL DOE #17's vagina, in violation of Title 11, Section 769(a)(2) of the Delaware Code.

COUNT 46- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 1st day of January, 2003 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 18, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #18's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 47- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 1st day of January, 2003 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, on another occasion did intentionally engage in sexual penetration with CAROL DOE # 18, who had not yet reached her sixteenth birthday and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #18's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 48- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 1st day of January, 2003 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, on another occasion did intentionally engage in sexual penetration with CAROL DOE # 18, who had not yet reached her sixteenth birthday and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #18's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 49- CONTINUOUS SEXUAL ABUSE OF A CHILD – S10-

EARL B. BRADLEY, between the 1st day of January, 2003 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, while having recurring access to CAROL DOE #18, a child under the age of fourteen, did intentionally engage in three or more acts of sexual conduct with CAROL DOE # 18, over a period of time not less than three months in duration, in violation of Title 11, Section 778(a) of the Delaware Code.

COUNT 50- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 8th day of December, 2000 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 19, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #19's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 51- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 8th day of December, 2000 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did on another occasion intentionally engage in sexual penetration with CAROL DOE # 19, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #19's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 52- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 13th day of December, 2004 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 20, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #20's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 53 - RAPE IN THE FIRST DEGREE – S10-

EARL B. BRADLEY, between the 17th day of July, 2006, and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual intercourse with CAROL DOE # 21, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did vaginally penetrate CAROL DOE #21 with his penis, in violation of Title 11, Section 773(a)(6) of the Delaware Code.

COUNT 54- UNLAWFUL SEXUAL CONTACT FIRST DEGREE – S10-

EARL B. BRADLEY, between the 17th day of July, 2006, and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally have sexual contact with CAROL DOE # 21 who had not reached her sixteenth birthday, and the Defendant stood in position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did intentionally touch CAROL DOE #21's buttocks, in violation of Title 11, Section 769(a)(2) of the Delaware Code.

COUNT 55 - RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 1st day of December, 2002 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 22, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #22's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 56- RAPE IN THE SECOND DEGREE – S10-

EARL B. BRADLEY, between the 1st day of September, 2008 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 23, who had not yet reached her fourteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #23's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 57 - RAPE IN THE SECOND DEGREE - S10-

EARL B. BRADLEY, between the 30th day of March, 2007 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally engage in sexual penetration with CAROL DOE # 24, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did digitally penetrate CAROL DOE #24's vagina, in violation of Title 11, Section 772(a)(2)(h) of the Delaware Code.

COUNT 58- UNLAWFUL SEXUAL CONTACT FIRST DEGREE - S10-


EARL B. BRADLEY, between the 30th day of March, 2007 and the 16th day of December, 2009, in the County of Sussex, State of Delaware, did intentionally have sexual contact with CAROL DOE # 24, who had not yet reached her sixteenth birthday, and the Defendant stood in a position of trust, authority or supervision over the child, or was an invitee or designee of a person who stood in a position of trust, authority or supervision over the child; to wit, Earl B. Bradley did intentionally touch CAROL DOE #24's vagina, in violation of Title 11, Section 769(a)(2) of the Delaware Code.

A TRUE BILL,

FOREMAN

SECRETARY

JOSEPH R. BIDEN, III
ATTORNEY GENERAL



DEPUTY ATTORNEY GENERAL

DATED: April 19, 2010